

Ann D. Berkowitz Project Manager – Federal Affairs

August 29, 2002

1300 f Street, NW Suite 400 West Washington, DC 20005 (202) 515-2539 (202) 336-7922 (fax)

Ex Parte

Marlene H. Dortch Secretary Federal Communications Commission 445 12th H Street, SW, Portals Washington, DC 20554

> Re: <u>Joint Application by Verizon for Authorization To Provide In-Region, InterLATA</u> Services in State of Virginia, Docket No. 02-214

Dear Ms. Dortch:

Per the request of the Wireline Competition Bureau staff, Verizon is providing the attached Model Interconnection Agreement. Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 02-1857.

Sincerely,

Attachment

cc: U. Onyeije

B. Olson

G. Remondino



August 1, 2002

Subject:

FCC Arbitration in Virginia

In accordance with the GTE merger conditions, Verizon previously has prepared and made available to CLECs operating in Virginia a Model Interconnection Agreement, which includes rates, terms and conditions for interconnection, network elements and/or resale. This Model Interconnection Agreement remains available to CLECs requesting negotiations in Virginia.

In addition, on July 17, 2002, the FCC issued an arbitration decision regarding interconnection negotiations between Verizon and three CLECs operating in Virginia – AT&T, WorldCom and Cox. See Petition of WorldCom, Inc, et al., Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc., and for Expedited Arbitration, CC Docket No. 00-218, et al., Memorandum Opinion and Order (July 17, 2002) ("VA Consolidated Arbitration"). The arbitration parties are now assessing the VA Consolidated Arbitration decision and preparing interconnection agreements in accordance with that decision. Verizon expects to file conforming agreements with the FCC as required by the VA Consolidated Arbitration decision. Once those agreements are signed and approved, they will be available for adoption under the Act.

In the interim, until the relevant agreement is completed and approved, CLECs in Verizon's former Bell Atlantic service territory in Virginia also may request in interconnection negotiations those service offerings and arrangements that the FCC found in the VA Consolidated Arbitration to be required by applicable law, but which are not currently incorporated in any existing interconnection agreement in Virginia. These service offerings and arrangements are listed on the attachment to this letter. Verizon is sending this industry letter to advise CLECs in Virginia that Verizon will accept such requests from CLECs. The availability of these service offerings and/or arrangements is subject to the results of any rehearing or appeal of the FCC's VA Consolidated Arbitration order.

You may initiate relevant requests by contacting Renee Ragsdale at renee.ragsdale@verizon.com

Attachment

ATTACHMENT TO VERIZON VIRGINIA INC. LETTER OF AUGUST 1, 2002

Requirement to provide two-way trunking arrangements at any technically feasible point of interconnection on Verizon's network.

Requirement to obtain state commission review before disconnecting CLEC line sharing/line splitting technology causing significant degradation of Verizon services.

Requirement to provide access to Verizon's unbundled inside wire subloops through any technically feasible method upon CLEC's request, in addition to existing methods.

Requirement to provide access to Verizon's unbundled subloops at Verizon's feeder distribution interface through any technically feasible method upon CLEC request, in addition to existing methods.

Restrictions on use of unbundled dedicated transport element.

Requirement to permit direct CLEC access to customer side of Verizon NID.

Requirement to provide spare unbundled copper loops and subloops.

Requirement to provide dark fiber together with any existing intermediate regenerators or amplifiers.

Requirement to provide dark fiber routed through multiple intermediate offices.

Requirement to search for dark fiber routes through multiple intermediate offices.

Requirement to provide reservation procedures for unbundled dark fiber elements.

Requirement to obtain state commission review prior to imposing limits on availability of unbundled dark fiber elements to a CLEC.

Requirement to make available, upon CLEC request, Verizon's pre-existing spectrum management procedures.

Requirement to make Verizon's TOPS switch available for routing blocked 911 and E911 calls.

Requirement to provide line and station transfers for IDLC loops.

Requirement to undertake systems development, at CLEC's expense, to accommodate non-Verizon loop qualification tools for line splitting.

verizon

Jeffrey A. Masoner Vice President Interconnection Services Policy & Planning

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August 1, 2002

Dennis Kelley
Director of Operations (Provisioning)
1-800-Reconex Inc.
2500 Industrial Avenue
Hubbard, OR 97032

Re: Interconnection Agreement Between 1-800-Reconex Inc. and Verizon Virginia

Inc. f/k/a Bell Atlantic - Virginia, Inc. in the State of Virginia

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Jeffrey A. Masoner

Vice President Interconnection Services

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